

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION

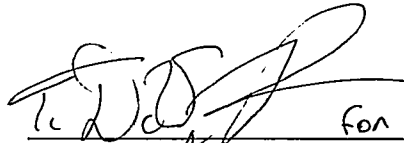
UNITED STATES OF AMERICA)	CRIMINAL NO. <u>1:21-789</u>
)	
)	18 U.S.C. § 2261A(2)(A)
v.)	18 U.S.C. § 2261A(2)(B)
)	
)	<u>INFORMATION</u>
KELSEY LEIGH CURLES)	
a/k/a “anonymoustoad”)	

COUNT 1

THE ACTING UNITED STATES ATTORNEY CHARGES:

That beginning on or around July 30, 2021 and continuing through on or about November 5, 2021, in the District of South Carolina and elsewhere, the Defendant, **KELSEY LEIGH CURLES, a/k/a “anonymoustoad,”** with the intent to kill, injure, harass, and intimidate persons who are known to the United States Attorney, known as “Victim 1” and “Victim 2,” used interactive computer services, electronic communication services, an electronic communication systems of interstate commerce, and any other facility of interstate and foreign commerce to engage in a course of conduct that placed Victim 1 and Victim 2 in reasonable fear of death and serious bodily injury and caused, attempted to cause, and the course of conduct would be reasonably expected to cause to Victim 1 and Victim 2 substantial emotional distress, to-wit: **KELSEY LEIGH CURLES, a/k/a “anonymoustoad”** sent unwanted and harassing electronic communications to Victim 2 expressing frustration following the end of a relationship with Victim 1, and **KELSEY LEIGH CURLES, a/k/a “anonymoustoad”** sent solicitations to an internet-based platform on the Dark Web and engaged in telephone calls seeking the injury and death of Victim 1 and Victim 2 in exchange for payment;

In violation of Title 18, United States Code, Section 2261A(2)(A) and (B).

A handwritten signature in black ink, appearing to read "M. Rhett Dehart", is written over a horizontal line. The signature is stylized with a large, looping initial "M".

M. RHETT DEHART (ebd)
ACTING UNITED STATES ATTORNEY